



§1115 Waiver Amendment

IMD Waiver



What is an IMD?

- Institution with more than 16 beds
- “Primarily engaged in providing diagnosis, treatment or care of persons with mental diseases, including medical attention, nursing care and related services.”*

*Federal definition - 42 CFR §435.1010

Overview



- FSSA has posted for public comment an §1115 waiver amendment to expand Medicaid reimbursement for acute inpatient stays in institutions for mental disease (IMD) for individuals with serious mental illness (SMI)
- Part of broader FSSA efforts to ensure a comprehensive continuum of behavioral health services
- Intended to improve access to acute care for enrollees with SMI

Proposal



Current State

- Current §1115 waiver permits reimbursement for stays in an IMD for substance use disorder
- Managed care entities (MCEs) may also elect to reimburse for short-term stays for serious mental illness (SMI)
- FSSA reimbursing for IMD stays for presumptively eligible enrollees with 100% state funds
- Reimbursement not available for fee-for-service enrollees between the ages of 21-64

Proposed Future State

- Reimbursement for short-term acute inpatient stays in an IMD for all Medicaid enrollees between 21-64
- Short term stays are defined as 15 days or less
 - Based on medical necessity
 - Not a “hard stop”
 - Federal requirement for 30 day statewide average length of stay
- Ensures comparable access to IMDs for enrollees regardless of managed care or fee-for-service enrollment

Waiver Goals



Reduced
utilization &
length of stay
in emergency
departments

Reduced
preventable
readmissions

Improved
availability of
crisis
stabilization
services

Improved
access to
community-
based
services

Improved
care
coordination



IMD Roles & Responsibilities

- Protocols to assess and provide referrals for housing insecurity as part of the social work assessment and discharge planning process
- Contact with each discharged beneficiary within 72 hours of discharge